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**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

**Kaleab Mekuriya,**

Plaintiff,

vs.

**The Travelers Indemnity Company;  
Indian Harbor Insurance Company, a  
Foreign Corporation; Constitution State  
Services, LLC, a Foreign Limited-Liability  
Company; Does 1 through 10, inclusive  
and Roe Corporations 1 through 10,  
inclusive,**

Defendants.

Case No.: 2:22-cv-00214-JCM-EJY

**STIPULATION AND ORDER TO  
EXTEND DISCOVERY  
(SECOND REQUEST)**

Pursuant to Fed R. Civ. P. 6, Fed. R. Civ. P. 26, LR IA 6-1, LR IA 6-2, LR 7-1, and LR 26-4, the parties, by and through their respective counsel of record, stipulate and agree that there is good cause to extend the discovery deadlines in the operative discovery plan [ECF No.27], as set forth below.

**A. Pursuant to LR 26-4(a), the parties stipulate that the following discovery was completed:**

1. The parties have served initial and supplemental disclosures pursuant to FRCP 26(a)(1);
2. Plaintiff has propounded written discovery on Defendants;
3. Defendants have propounded written discovery on Plaintiff;
4. Defendants have answered written discovery requests;
5. Plaintiff has answered written Discovery requests.

**B. Pursuant to LR 26-4(b), the parties stipulate that they need to complete the following discovery:**

1. Deposition of Plaintiff.
2. Deposition of Defendants.
3. Deposition of percipient witnesses.
4. Initial and Rebuttal Expert Disclosures.
5. Deposition of Defendant's FRCP 30(b)(6) witnesses and/or employees.
6. Depositions of Plaintiff's medical providers.
7. Depositions of each party's respective experts;
8. Additional Written Discovery; and
9. Any other discovery that may become necessary upon completion of the discovery above.

**C. Pursuant to LR 26-4(c), the parties stipulate an extension is needed for the following reasons:**

The parties have been diligent in conducting discovery thus far. Specifically, the parties have served written discovery and are in the process of getting depositions set. Plaintiff would like to take the FRCP 30(b)(6) depositions of Defendants in

1 advance of the initial expert disclosure deadline. Based on the current deadlines and  
2 Plaintiff's firm's trial calendar, this will be impossible with the current deadlines.  
3 Additionally, the parties have also been discussing potential settlement and remain  
4 hopeful that this case can potentially resolve. For these reasons, there is good cause  
5 to extend the discovery deadlines sixty (60) days.

6  
7 **D. Pursuant to LR 26-4(d), the parties stipulate to the following proposed**  
8 **schedule for completing all remaining discovery:**

9 The parties agree to extend all the discovery deadlines in this case by ninety (90)  
10 days, as set forth below:

- 11  
12 1. Extend the discovery cut-off deadline from 12/27/22 to 2/27/23;  
13 2. Extend the deadline to amend the pleadings and add parties from 9/26/22 to  
14 12/27/22;  
15 3. Extend the date for initial expert disclosures from 9/26/22 to 12/27/22;  
16 4. Extend the date to disclose rebuttal expert witnesses from 10/24/22 to  
17 1/26/23;  
18 5. Extend the date to file dispositive motions from 1/28/23 to 3/29/23; and  
19 6. Extend the date to file the Joint Pre-Trial Order from 2/28/23 to 4/29/23. If  
20 dispositive motions are filed, the joint pretrial order is due thirty (30) days from  
21 the entry of the court's ruling on the motions.  
22  
23  
24  
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7. Fed. R. Civ. P. 26(a)(3) Disclosures must be included in the Joint Pre-Trial Order.

DATED this 14<sup>th</sup> day of September 2022      DATED this 14<sup>th</sup> day of September 2022

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*/s/ Bre'Ahn Brooks*

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DATED this 14<sup>th</sup> day of September 2022

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*/s/ Erich Storm*

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**Order**

IT IS HEREBY ORDERED.

Dated this 14th day of September, 2022.

  
UNITED STATES MAGISTRATE JUDGE